

SUMMARY OF PROPOSED SUGGESTED CONTROL MEASURE FOR AUTOMOTIVE REFINISH COATINGS

Background

In 2002, the California Air Resources Board (ARB) conducted a survey to gather information on automotive refinish coatings sold in California in 2001. The data will be used to update the ARB's emission inventory, evaluate the feasibility of reducing volatile organic compound (VOC) limits for these coatings, and develop a Suggested Control Measure for Automotive Refinish Coatings (SCM).

Overview of SCM Proposal

ARB staff is working with the air districts to develop a SCM to improve enforceability of existing district rules, reduce VOC emissions, and increase consistency among air district rules. Discussed below are the key areas of the existing district rules that would be modified by the SCM. The proposed SCM would:

- Combine the Group I and Group II vehicle categories, and establish the same VOC limits for passenger vehicles, heavy-duty vehicles, and mobile equipment. This would improve enforcement and simplify recordkeeping.
- Eliminate the composite VOC limit for multistage systems, and replace it with specific VOC limits for clear and color coatings. This would improve the enforceability of district rules.
- Simplify and combine coating categories. The SCM would clarify and combine coating categories. Table 1 shows coating categories typically found in the existing district rules and the corresponding category in the proposed SCM.
- Eliminate the specialty coatings category and replace it with specific category limits as needed. The survey data indicate that several of the coating types allowed under the specialty coatings category are no longer sold in California. Eliminating the specialty coatings category will reduce usage recordkeeping requirements making it easier for the end user to comply with the SCM.
- Establish VOC limits based upon available coating technologies. ARB staff analyzed the survey data to determine appropriate VOC limits. Table 2 shows the proposed VOC limits. Table 3 shows the number of companies that reported coatings that meet the proposed VOC limits in the SCM.
- Establish a prohibition of possession provision, which would prohibit any person from having, at any automotive refinishing facility, coatings or solvents that do not comply with the proposed VOC limits. This provision would enhance the districts' ability to enforce the VOC limits.

- Establish a 25 grams per liter VOC limit for solvents used in cleaning operations, including surface preparation and spray gun cleaning. This limit is consistent with the adopted VOC limit for solvents in the South Coast Air Quality Management District.
- Improve recordkeeping and labeling. The SCM sets consistent recordkeeping requirements for the coating end user. The SCM also establishes labeling requirements for coating manufacturers that would aid in determining compliance with the applicable VOC limits.

Table 1
Proposed Coating Categories

Existing Coating Category	Proposed Coating Category
Pretreatment Wash Primer	Pretreatment Coating
Precoat	Primer
Primer	Primer
Primer Surfacer	Primer
Primer Sealer	Primer
Topcoat	Color Coat
Metallic/Iridescent Topcoat	Color Coat
Multi-stage Topcoat System	Color Coat
	Clear Coat
Camouflage	Color Coat
Multi-Colored Multi-stage	Multi-color coating
	Clear Coat
Multi-Colored	Multi-color coating
Temporary Protective Coating	Temporary Protective Coating
Bed Liner Coating	Truck Bed Liner Coating
Specialty Coating:	N/A
Adhesion Promoters	Primer
Elastomeric Materials	
(Plastic/Flexible Primers)	Primer
(Elastomeric clears)	Clear coat
Uniform Finish Coating	Uniform Finish Coating
Rubberized Asphaltic Underbody	Underbody Coating
Antiglare Safety Coatings*	Any other coating type
Impact Resistant Coatings	Any other coating type
Water Holdout Coatings*	Any other coating type
Weld Thru Coatings*	Any other coating type
Bright Metal Trim Repair	Any other coating type

* Based on the ARB survey, these coatings were not sold in California in 2001.

Table 2
Proposed VOC Limits in the Draft SCM

Coating Category	VOC Limit (Grams/Liter) as Applied (On Or After January 1, 2008)
Clear Coat	250
Color Coat	420
Multi-color Coating	680
Pretreatment Coating	660
Primer	250
Temporary Protective Coating	60
Truck Bed Liner Coating	310
Underbody Coating	430
Uniform Finish Coating	540
Any other coating type	250

Table 3
Summary of VOC Analysis of Automotive Refinish Coatings

Number of Companies that:*	Clear coat	Single Stage	Multi- stage	Multi- color	Primer	Pre- treat- ment	Temp. Pro- tective	Truck Bed	Under- body	Uni- form Finish
Sold type of coating in CA	15	13	12	NR	15	13	2	1	3	5
Reported valid mixtures	14	10	11	NR	14	11	2	1	3	3
Reported compliant mixtures/Syst em **	11	4	7	NR	12	1	1	1	2	2

* 17 companies responded to the survey

** The number of companies that reported mixtures that meet the proposed VOC limits in the draft SCM. For Single Stage Color and Multistage Color coatings, the number of companies is limited to those that reported complete systems that comply with the proposed SCM.

NR-None Reported.